

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**NOTICE OF FILING DECLARATION OF SARA KOTH**

In the teleconference held on October 7, 2022, the Court directed State Defendants to file an affidavit by an individual with operational authority regarding the assertion of investigative privilege over the documents on State Defendants' privilege log related to the Coffee County investigation. Tr. of Oct. 7, 2022 Conf., 3:14-23. As discussed on that call, the declaration of Sara Koth, who is the Chief Investigator for the Secretary of State's office, is attached and filed by 10:00am this morning, discussing both the assertion of privilege and providing the general description of the documents covered on the log.<sup>1</sup> *Id.* at 4:23-5:4, 6:1-7:5.

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<sup>1</sup> The documents over which State Defendants are asserting investigative privilege were also delivered to the Court on Friday, October 7, 2022 for in-camera review. *Id.* at 7:11-8:9.

Respectfully submitted this 10th day of October, 2022.

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**CERTIFICATE OF COMPLIANCE**

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing NOTICE has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ Bryan P. Tyson  
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